Internal Revenue Service

Department of the Treasury

Examiner:

Donna Meadors

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Date: December 2, 2004

Mr. Lindsey K. Springer 5147 S. Harvard, Suite 116 Tulsa, OK 74106

Dear Mr. Springer

We have reviewed materials regarding your participation in tax avoidance transactions. Based on the information provided, we are discontinuing the review at this time with respect to possible action under Internal Revenue Code sections 6694, 6695, 6700, 6701, 7402, 7407 and 7408 as they relate to these transactions. This letter should not be considered to mean that the Internal Revenue Service has approved the tax avoidance transactions; rather, it is a notice that our action under the above code sections has been discontinued.

Our review of the transaction does not constitute an examination of your income tax returns. We may examine your income tax returns for correct determination of any income tax liability.

Please contact me if you have any questions you would like to discuss.

Thank you for your cooperation.

Sincerely yours,